

NOV 28 2017

## UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT  
W. DIST. OF N.C.

for the

District of

Division

Case No. 1:17-cv-319-MR

(to be filled in by the Clerk's Office)

PAMELA Diz

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)  Yes  No"See Attached"

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

PAMELA Diz  
PO BOX 508  
LEICESTER, ~~Bl~~ W. COMBE COUNTY  
N.C. 28748  
828-515-0398  
tranquilityestatesllc@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Rebecca Martin  
OWNER FINANCER  
25 AMANGELA DR  
ASHEVILLE, BUNCOMBE Cty  
NC, 28806

Defendant No. 2

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

FRANCIS AND JEFF TACY  
22 FANNY'S FARM Rd  
LEICESTER, BUNCOMBE Cty  
NC, 28748

Defendant No. 3

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

SERGIO DE SOUSA  
601 NW 1ST WAY  
DEERFIELD BEACH, WPB Cty  
FL, 33441

Defendant No. 4

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Adam Bull  
ATTORNEY  
160 E. CHESTNUT ST  
ASHEVILLE, BUNCOMBE Cty  
NC, 28801

Defendant No. 1

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

SABRINA DIZ

1727 JOHNSON ST APT S.

HOLLYWOOD, MIAMI DADE CTY

FL, 33020

Defendant No. 2

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

KELLY MARLER

SOCIAL WORKER

PO BOX 7408

ASHEVILLE, BUNCOMBE CTY

NC, 28802

Defendant No. 3

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

LAREMIE COLLINS

22 WIND SHADOWS CIR

LEICESTER, BUNCOMBE CTY

NC, 28748

Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

BRITNEY SHULTZ

PO BOX 16492

ASHEVILLE, BUNCOMBE CTY

NC, 28816

Defendant No. 1

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

The Regeneration Station

26 GLENDALE Ave #B  
ASHEVILLE, BUNCOMBE Cty  
NC, 28803

Defendant No. 2

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

JOHNATHAN McELROY  
ATTORNEY

370 N. LOUISIANA Ave # C-1  
ASHEVILLE, BUNCOMBE Cty  
NC, 28806

Defendant No. 3

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

ASHEVILLE POLICE DEPARTMENT

100 COURT PLAZA  
ASHEVILLE, BUNCOMBE Cty  
NC, 28801

Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (*if known*)

MISSION HOSPITAL & AFFILIATES

509 BILTMORE AVE  
ASHEVILLE, BUNCOMBE Cty  
NC, 28801

Defendant No. 1

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

McINTOSH LAW FIRM  
ATTORNEYS

PO BOX 2270  
DAVIDSON,  
NC, 28036

Defendant No. 2

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Stoney Spicer

21 Castlebay Dr  
Leicester, Buncombe City  
NC, 28748

Defendant No. 3

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Defendant No. 4

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question  Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*Title 18 Chapter 7 Section 117*

*Title 18 Chapters 95 & 96 Racketeering & RICO*

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) PAMELA DIZ, is a citizen of the  
State of (name) North Carolina.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name)  
\_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s) *"SEE ATTACHED"*

##### a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

# Basis for Jurisdiction

~~IV.B~~

The Defendant is an individual. The Defendant Rebecca Martin is a citizen of the state of North Carolina

The Defendants are individuals. The Defendants Francis and Jeff Tacy are citizens of the state of North Carolina

The Defendant is an individual. The Defendant Sergio De Sousa is a citizen of the state of Florida.

The Defendant is a corporation. The Defendant Adam Bull is incorporated under the laws of the state of North Carolina.

The Defendant is an individual. The Defendant Louis Vega is a citizen of the state of North Carolina.

The Defendant is an individual. The Defendant Sabrina Diz is a citizen of the state of Florida.

The Defendant is an individual. The Defendant Kelly Marler is a citizen of the state of North Carolina.

The Defendant is an individual. The Defendant Laramie Collins is a citizen of the state of North Carolina

The Defendant is an individual. The Defendant Britney Shultz is a citizen of the state of North Carolina.

The Defendant is a corporation. The Defendant The Regeneration Station is incorporated under the laws of the state of North Carolina

The Defendant is a corporation. The Defendant Johnathan McElroy is incorporated under the laws of the state of North Carolina

The Defendant is a corporation. The Defendant Asheville Police Department is incorporated under the laws of the state of North Carolina

The Defendant is a corporation. The Defendant Mission Hospital is incorporated under the laws of the state of North Carolina

The Defendant is a corporation. The Defendant McIntosh law Firm is incorporated under the laws of the state of North Carolina

The Defendant is an individual. The Defendant is a citizen of the state of North Carolina

b. If the defendant is a corporation

The defendant, (name) "SEE ATTACHED", is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The "Enterprise" through all defendants has taken over \$250,000 from Plaintiff over the last 4 1/2 years and caused about \$100,000 in damages and the property is worth over \$2.5 million.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

"SEE ATTACHED"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

"SEE ATTACHED"

### III. STATEMENT OF CLAIM

#### **The claim against the enterprise is as follow:**

Rebecca Martin is the main head of the enterprise as I will proceed to describe, as well as, Francis and Jeff Tacy, who collectively will be referred to as "The heads of the Enterprise" from here on.

The goal of the enterprise was to force Plaintiff into forfeiting on her mortgage or taxes, so Rebecca Martin could foreclose on the property at which time she would sell it to Francis and Jeff Tacy for the actual value of the property and they could continue to expand their ownership of land in this area building luxury cabins after evicting all 24 families off Plaintiff's property, getting rid of trailers and using existing pads for the cabins they planned on building, plus an additional 10 cabins in the preapproved area on Plaintiff's land as they built their luxury wedding get-a-way resort. The land was sold to Plaintiff as a scam from the very beginning.

Rebecca martin sold me a piece of land for an amount I could afford while she waited for Francis Tacy to pass her USDA loan inspections, (as described under Francis Tacy and Jeff Tacy's part of Statement of Claim below) and be able to then purchase said property at the regular price from Mrs. Martin at which time she had every intention of having caused Plaintiff to forfeit on either a mortgage payment or on property taxes, so Rebecca Martin could get her property back after taking Plaintiff's deposit, a year's worth of mortgage and taxes and a year's worth of improvements totaling about \$250,000 and effectively leaving Plaintiff with nothing.

Francis Tacy was defrauding the USDA as stated in her statement of claim, and once she had successfully finished defrauded the USDA, and Mrs. Martin and her conspirators had failed to force a foreclosure against Plaintiff, Mrs. Tacy became very involved in helping Rebecca Martin try and bankrupt Plaintiff to lose property, these two women and Mrs. Tacy's husband, Jeff Tacy then recruited Plaintiff's ex-husband, Sergio De Sousa into their scam with promises of money. Their plan was to help Sergio De Sousa embezzle and hide a lot of money from Plaintiff, get custody of his son and get paid for bankrupting Plaintiff and end up getting child support above it all. (For a detailed account on Mr. De Sousa's involvement please see his part of the Statement of Claim below)

Sergio De Sousa, Laramie Collins, Lou Vega and his girlfriend Katie Korniotes were all working together, as it is detailed below, with promises of being able to keep the trailer they were living in, and later they added Stormy Spicer and Greg Norton to the list of conspirators with the same promise of owning the trailer they were then renting from Plaintiff, they also used coercion in the case of Stormy Spicer through threats by Kelly Marler from DSS of losing their child if they did not help.

It still eludes Plaintiff exactly who Mrs. Marler is working for other than for the benefit of the enterprise. Plaintiff is sure as evidence is presented it will prove that Mrs. Marler is somehow connected to Mrs. Martin, and that Mrs. Marler is a “hired gun”, willing to hurt families for money and for her own sick pleasure.

Mrs. Martin and Francis Tacy were both school teachers, and may have met through that avenue, but it will be clear by the evidence presented that Mrs. Tacy bought her piece of land fully expecting to put luxury cabins in place of Plaintiff’s trailers by throwing out 25 families from their homes, and that she expected to add 10 more cabins in the preapproved area, and that when their tactics to bankrupt Plaintiff did not work, this caused “The Heads of the Enterprise” to lose millions.

Rebecca Martin lost a couple of million dollars when she could not find a way to foreclose on Plaintiff as she had planned from the moment she offered the property to Plaintiff through owner financing.

“The Heads of the enterprise” gave Sergio De Sousa, attorney Adam Bull’s number, and that’s when the evidence will show the plan to take Plaintiff’s son through parental interference to force Plaintiff to go fight for her son in Florida was put together. This would have caused Plaintiff to go into bankruptcy especially since Adam Bull and “The Heads of the Enterprise”, had guided Sergio De Sousa on how to embezzle thousands from Plaintiff prior to moving out of state, leaving Plaintiff in the brink of bankruptcy already.

Adam Bull after having involved himself with that, unbeknownst to Plaintiff at that time, still took Plaintiff’s case a few months later, as it is described in his part of the statement of claim below, to cost Plaintiff more money, cause her to lose the property by taking important documents such as the post-nuptial and prevent her from recovering on the theft of the wood by keeping evidence against the Regeneration Station, and to prevent Plaintiff from recovering damages by getting Plaintiff’s case against Laramie Collins dismissed.

Plaintiff will show that ‘The Heads of Enterprise’ are so very well connected and powerful they were able to have a nurse at Mission My Care Plus Candler, the Plaintiff’s doctor’s office, assist them by messing with her medications in a negligent and criminal manner, and they were also able to get a nurse at Mission hospital NICU to commit malpractice and violations of their licenses to assist them in hurting Plaintiff. Plaintiff cannot prove that these nurses were aware of the goal of the enterprise only that their motives behind their actions were malicious and for the purpose of furthering the enterprise’s goals, but Plaintiff hopes that testimony, witnesses and additional evidence being gathered will make this point clearer at a later time as the trial develops. Evidence will prove that the acts claimed under their perspective part of the statements of claims below under Mission did occur, and their purpose will be clear, but who exactly they were working for, other than the enterprise itself, and why exactly they would agree to go along with it, is for right now obscured.

Additionally there are two law firms negligently involved which further proves the amount of power and connections these “Heads of the Enterprise” have , these could have joined in as a favor to one of their “buddies” such as Adam Bull, or where doing a favor to one of ‘The Heads of the enterprise” but evidence will clearly show that these unethical and legal violations were done to further the enterprise’s goal, one to prevent a loan that could assist Plaintiff to invest the money and increase her income, and to prevent Plaintiff from being able to get any other loans to assist her in avoiding bankruptcy and invest money to increase her income by taking out a judgement that had been previously voluntarily dismissed by these same attorneys and signed by a judge with prejudice, to stop any ability of Plaintiff to take out a loan to pay mortgage or taxes, if necessary, while under all the attacks being perpetrated against Plaintiff by The Heads of the Enterprise” Who exactly they were working for is of little importance at this time, and will most likely become clearer as evidence and testimony progresses, what is important is that the evidence will clearly show that laws were broken and Plaintiff’s rights were violated to further the enterprise’s agenda even without needing to be part of the enterprise directly.

Additionally, these two lawyers, were not the only lawyers whose malpractice further the enterprise’s agenda even if unknowingly, and the fact that North Carolina State bar would not put a stop to these actions, and refused to investigate more than one attorney and clearly stated to Plaintiff that they don’t answer to anyone, made it more difficult to get to the bottom of things and figure out what was going on earlier.

Mr. McElroy cost Plaintiff \$30,000 with minimal effort and loss to himself. The MacKintosh law firm, just filed a law suit, that became a judgement and prevented Plaintiff from getting loans, as did other tactics they used to cause Plaintiff’s credit to be undesirable for any loan, through other conspirators such as an insurance agent, Sergio De Sousa, an illegally acquired writ, bank fraud, causing Plaintiff to have to continue to close accounts and open new ones which caused bills to go unpaid, and by cancelling Plaintiff’s insurances so that she would have to pay deposits over and over again, until she became uninsurable.

Although some Defendants listed only committed negligence and/or malpractice, and may have been unaware of the fact that their actions were being used to further the enterprise’s agenda, their actions need to be presented in this case so that a pattern of behavior can be proven, and all dots can be connected, to show how large and injurious this activity by the enterprise was against Plaintiff. The enterprise used people against Plaintiff even without their knowledge, just from knowing how those people usually behave, from knowing the system of the area very well, as Mrs. Martin knows, through defamation of character, and many other tactics, that helped them manipulate and coerce people into helping the enterprise reach their ultimate goal.

**Therefore, the main enterprise is structured in the following manner:**

**THE HEADS OF THE ENTERPRISE:** These are the people who created the enterprise for their benefit and goal.

Rebecca Martin, Francis Tacy and Jeff Tacy, are collectively referred to throughout as "The heads of the Enterprise" The purpose of the enterprise was to force Plaintiff into forfeiting on her mortgage and/or taxes, or getting locked up in jail or in a mental institution all for the purpose of forcing Plaintiff to lose her land.

**THE MAIN CONSPIRATORS OF THE ENTERPRISE:** These were people who were fully aware of the purpose and function of the enterprise and were fully invested in the enterprises agenda for their own benefit as well.

Sergio De Sousa, Sabrina Diz, Laramie Collins, Adam Bull, and Lou Vega were involved in the enterprise, knowing full well that the goal was for "the head of the enterprise" to acquire Plaintiff's land, and were given or promised different types of rewards when they helped achieved the goal of the enterprise.

**CONSPIRATORS TO THE ENTERPRISE:** These are people who may or may not have known what the goal and agenda of the enterprise was, but were willing participants in furthering the enterprise's agenda for their own gain.

Regeneration Station, two nurses from Mission, and Kelly Marler, who for different reasons assisted in breaking the law against Plaintiff, with little regard as to why they were being asked to do the things they were doing because of the gains they were receiving, and assisted the enterprise whether they knew or not what the ultimate goal was, is at this time unclear, but they knew they were breaking the law and that they were assisting the enterprise.

**NEGLIGENT ASSISTANTS TO THE ENTERPRISE:**

Finally, Attorney McElroy, Aaron Low, Asheville Police Department, McIntosh law firm, and child support, were helpful to the enterprise due to their negligence and/or malpractice without any direct involvement or understanding of what was happening and why, but because of the power and social status of "The Heads of the Enterprise". Unfortunately, the fact that their lack of ethics could be counted on and used against Plaintiff by the enterprise, and that their negligence has furthered the enterprise's goals even if without their direct knowledge into the enterprise's agenda, should be addressed and they should be responsible for the damages they caused, even if their actions were not criminal.

There are unspecified defendants at this time as well.

The enterprise is losing millions in this failed scam against Plaintiff. They have lost a lot of money in their failed conspiracy against Plaintiff as well, and there is cause to suspect that an investigation into this as a motive for the murder of Plaintiff's child should be ordered.

The attacks by this enterprise against Plaintiff have not ceased in the last four and a half years, and Plaintiff has been unable to find an attorney willing to take on such a large case against

such powerful rich people, due to this, Plaintiff has felt that she had no choice but to put part of her property up for sale, which should be appalling to our nation's way of life, since we pride ourselves in our freedom, and our ability to pursue happiness, this is a violation of Plaintiff's basic civil right as an American, but as sad as it is, Plaintiff had to place her property on the market, and as soon as Plaintiff listed property, Mrs. Martin began to attempt to foreclose on the property when she saw that she would only get paid the remaining amount she was owed, and she would be losing millions. (see attached letters)

Plaintiff humbly requests that the court accept this suit as a suit of common law and preserve Plaintiff's right to a jury trial if necessary.

Evidence will show that Rebecca Martin is guilty of Title 18 chapter 95 1951(b), 1956 through financial transaction involving the transfer of title of any real property, vehicle ext., through specified unlawful activity and other Title 18 violations as follows:

Kidnapping, destruction of property

Acts constituting a continuing criminal enterprise

Per section 152 relating to concealment of assets; false oaths and claims; bribery

Section 641 relating to public money, property, or records

Section 657 relating to lending, credit, and misapplication by bank officer or employee

Section 658 relating to mortgaged or pledged to farm credit

Section 1014 relating to fraudulent loans

Section 1201 relating to kidnapping

Section 1708 theft from the mail

Rebecca Martin is in violation of Title 18 1957 Engaging in monetary transactions in property derived from specified unlawful activity.

1959 violent crimes in aid of racketeering activity

The enterprise and conspirators are involved in RICO crimes as outlined in title 18 chapter 95 s 1961 as follows:

Kidnapping, robbery, bribery, extortion

Section 891-894 relating to extortionate credit transactions

Section 1344 relating to financial institution fraud

Section 1503 relating to obstruction of justice

Section 1510 relating to obstruction of criminal investigation

Section 1511 relating to obstruction of state or local law enforcement

Section 1512 relating to tampering with a witness or victim

Section 1546 relating to fraud and misuse of documents

section 1952 relating to racketeering as outlined earlier.

Rebecca Martin is also in violation of title 18 chapter 95 s 1962 Prohibited activities

**The claims against Rebecca Martin are as follows:**

Rebecca Martin willfully and knowingly sold Plaintiff a property which she knew to be worth a lot more than she sold it to Plaintiff for, for the purpose of scamming Plaintiff out of close to \$250,000.

Rebecca Martin then continued to lend Plaintiff money, financing several properties to Plaintiff without a lender's license and through abusive lending practices, in hopes that Plaintiff would owe more per month than she would take in as income. While scamming Plaintiff, Rebecca Martin attempted to pull the same scam again in a different park, but when she saw that the scam against Plaintiff was not going according to plan, she decided not to go through with it. Plaintiff will be presenting evidence that this conspiracy against her, led by Mrs. Martin and Mr. and Mrs. Tacy has been going on for four and a half years, and that she attempted to do it again after that to someone else, and Plaintiff believes that further investigation is going to reveal that she has done this before too.

There is a very good reason to believe that this enterprise will continue against Plaintiff until the court orders it to stop.

Rebecca Martin chose Plaintiff as a target for the sole reason that Plaintiff is of Hispanic decent and that this would help her use people against Plaintiff, that this would help her to easily fool them into thinking that Plaintiff was racist against the local white people when in fact it was Rebecca Martin that was using Plaintiff's race against her. Plaintiff believes after all evidence is presented that the court will agree that this has been a hate crime as well.

Rebecca Martin used the fact that Plaintiff was not perfect and had a previous criminal record against Plaintiff to spread libel and slander about her through her conspirators even though Plaintiff had been a model citizen since paying her debt to society for her crime, but this one blemish against her compounded with the fact that Plaintiff was of Hispanic decent helped Rebecca Martin to use people against Plaintiff, and again this would constitute a hate crime.

Rebecca Martin was a slum landlord while taking tax breaks designed for people helping low income families. Her financial status and connections have allowed her to leave her tenants in squalor as evidence will show, while not worrying about consequences.

Rebecca Martin willfully promised a trailer to a tenant and then proceeded to sell Plaintiff the property, listing said trailer on the title, so Plaintiff could not sell it to that tenant either, to manipulate that tenant and to establish a reason for that tenant to want to help Rebecca Martin force Plaintiff off the property, so that he could then buy the trailer from Rebecca Martin as had been agreed upon. Further details under the part of the statement of claim for Lou Vega

Rebecca Martin used tenants that had been with her for many years to start lawsuits against Plaintiff, one of whom had to wait until her lease was up with Mrs. Martin, a total of 5 months, before they could start a lawsuit against Plaintiff. This tenant, Britney Shultz did so 14 days into the new lease with Plaintiff, even though she had lived under Rebecca Martin's ownership for two years, and had to use lies because by then Plaintiff had already fixed all the things Mrs. Martin and tenants were planning on using for the lawsuit. Further details below under the part for the statement of claim for Britney Shultz

Rebecca Martin guided these tenants into how to abuse the system against Plaintiff by letting them know how to manipulate Pisgah legal services' lawyers into helping them. Details contained under the part of the statement of claim for Laramie Collins as well. This was done to set it up to look like Plaintiff was being attacked by lawyers when in reality it was her behind the scenes from the very beginning.

Rebecca Martin and other "Heads of the enterprise" caused and/or made to be caused property damage on Plaintiff's property to Plaintiff's personal well, killing and poisoning animals, causing damage to the community well, destroying tools, stealing work vehicle, destroying trailers, stealing money and tools, stealing wormy chestnut wood. Details below under the part of the statement of claim for the regeneration station and others.

Rebecca Martin and other "heads of the enterprise" caused and/or made to be caused abuse and harassment against Plaintiff through malicious abuse of civil process. Plaintiff awaits certified copies of files from Buncombe County courthouse for 25 cases filed against her by only five people all connected to Rebecca Martin and Franny's farm owners, Mr. and Mrs. Tacy.

Rebecca Martin and other "heads of the enterprise" caused and/or made to be caused a traumatic experience to a child, evidence tampering, contempt, perjury and fraud involving a minor child. Covered in detail under the forceful removal of Plaintiff's child from the safety of her home by Sabrina Diz in the part of the statement of claim for Sabrina Diz below.

Rebecca Martin and other "heads of the enterprise" caused and/or made to be caused the endangerment of a child, and Plaintiff's illegal detainment. Details under the statement of claim against Sabrina Diz, and the malicious abuse of the involuntary commitment order.

Rebecca Martin guided Laramie Collins on how to cause damage to the well and damage was caused on two separate occasions.

Rebecca Martin acting as Plaintiff's mentor and claiming to be a good Christian referred Plaintiff to people she could later ask to hurt Plaintiff, such as insurance agent, tenants and others.

Rebecca Martin was committing Tax Fraud, the evidence will reveal that this is not the only property in which she is perpetrating this violation.

Rebecca Martin and other "heads of the enterprise" caused or/and made to be caused malpractice by attorneys against Plaintiff.

Rebecca Martin and other "heads of the enterprise" caused and/or made to be caused an obstruction of justice in the investigation of Plaintiff's daughter's murder, in the kidnapping of Plaintiff's son, and the fraudulent removal of Plaintiff's foster son Elijah Davis

Plaintiff is not an attorney. Plaintiff is moving forwards doing the best she can pro se and alone with a major case like this one. Plaintiff has attempted to read as much as she could prior to filing this case but she needs to move forwards right away due to the relentless severity and intensity of these attacks. Plaintiff needs the court to help her put a stop to these relentless attacks, and in an attempt at justice Plaintiff is listing all the laws that she can easily tell have been broken against her, but she understands that without a law degree, she may be missing some and, so she respectfully requests that if she is missing any, that Your Honor add them as needed, or allow her to amend as necessary.

Evidence will show that Rebecca Martin is guilty of Title 18 chapter 95 1951(b), 1956 through financial transaction involving the transfer of title of any real property, vehicle ext., through specified unlawful activity.

## **FRANCIS TACY AND JEFF TACY**

Francis Tacy and Jeff Tacy are collectively referred to as "the heads of the enterprise" with Rebecca Martin throughout this complaint.

Since the enterprise's goal was to acquire the property sold to Plaintiff as a scam by Rebecca Martin for the purpose of allowing Rebecca Martin to sell it to Francis and Jeff Tacy for the actual price of the land as had been prearranged before it was sold to Plaintiff. Once Rebecca Martin acquired the property back through illegal, violent and intimidation tactics, and sold it to Mr. and Mrs. Tacy, they in turn planned on throwing out all 25 families on the street so they could expand their planned luxury wedding resort into Plaintiff's adjacent property to build luxury cabins on the already set up pads and on the area, that has already been preapproved for another 10 trailers or cabins. All their efforts, whether they shared every detailed of their activities with each other or not constitute an enterprise as described in title 18 Racketeering and RICO chapters, and since the agenda of the enterprise was to fulfill their ultimate goal

collectively of acquiring Plaintiff's land, this means that calling Rebecca Martin, Mr. and Mrs. Tacy "the heads of the enterprise" covers the fact that all other codefendants no matter how involved or knowledgeable they were of the activities of the above named "heads of the enterprise" were in fact working in one way or another to further their goal as "the heads of the enterprise" collectively.

The reason that Mr. and Mrs. Tacy could not purchase both sides at one time was because they were defrauding the USDA to get government funds to purchase the side they did purchase and had to wait over a year to pass inspections and fool the inspectors into thinking that they were building a barn and that they were becoming sheep farmers before they could purchase a huge track of land with a trailer park on it, so as one of the head of the enterprise Rebecca Martin had to wait for them to finish doing that, she decided to scam the Plaintiff out of the deposit money, a year's worth of mortgage and taxes and improvements.

Evidence will show they took out a USDA loan through Fraud in violation of Federal law protecting Federal money.

Evidence will show that they conspired with others in the attempts at destroying Plaintiff's life and reputation at any cost, to acquire Plaintiff's property.

Evidence will show that they continued to defraud the USDA and when they could not get Plaintiff's side as had been the plan within a year, they had to change their USDA guidelines to state that they were now raising turkeys, that they have the facilities to house, kill and refrigerate the 1000 turkeys they claim to be raising and killing per month, which is not true.

Evidence will show they have paid and bribed their way into this loan and other Racketeering and RICO activities.

Evidence will show that Sergio De Sousa was working with Mr. and Mrs. Tacy directly to help further the enterprise's agenda for a very long time, even prior to purchase.

Evidence will show that they attempted to kill Plaintiff by running her off the road.

Evidence will show that Mrs. Tacy has perjured herself while maliciously abusing the civil process to further her agenda against Plaintiff.

Evidence will show that the heads of the enterprise paid Sergio De Sousa's lawyer's fees for more than 2 years to use him and his divorce to Plaintiff as a means of taking Plaintiff's property, and/or child to derail Plaintiff, cost her money or take her property from her.

Evidence will show that the main co-defendants who were fully aware of the enterprise's agenda and were working directly with the three "heads of the enterprise" Rebecca Martin, Francis Tacy and Jeff Tacy are:

Sergio De Sousa  
Adam Bull

Lou Vega  
Sabrina Diz  
Kelly Marler  
Laramie Collins

Other codefendants listed in this complaint helped further the enterprise's agenda through negligence of their prospective positions, either malpractice or through intimidation from "the heads of the enterprise", and they must be listed in the complaint to show the power, connection and control that these "heads of the enterprise" have collectively and how they have exercised that power against Plaintiff through these people for the purpose of furthering their own agenda.

Evidence will show that Mr. and Mrs. Tacy use their teenage boy to get access to teenagers they can then use to build things around their farm for free by later allowing them to party on the grounds with no adult supervision and with alcohol. These teenagers are willing to do just about anything for Mrs. Tacy and her son.

Evidence will show that they no longer even live there, that they have in their possession advanced technology for distillery and according to Mrs. Tacy that they sell their moonshine at their parties.

Francis Tacy and Jeff Tacy by their own statements are dangerous people who own guns and use violence and intimidation to further their agendas.

### **Laramie Collins**

Please refer to the timeline of events attached for a detail chronologic description of events, the following statement of claim for Laramie Collins is a summarization of what occurred.

It was very clear that Laramie Collins and her co-conspirators were being guided by an expert in landlord/tenant laws and on how to cause property damage on my property, specifically damage that would give them a reason to sue over.

"The heads of the enterprise" were working together with Sergio De Sousa to make it seem like the lawyers were assisting them on how to fabricate evidence against me to use to sue over, and Mrs. Martin, who at this time was like a mentor to Plaintiff was reinforcing this belief as was Plaintiff's then live in husband, Sergio De Sousa, this was done to use it against Plaintiff later by calling her crazy, and to hide their involvement by making it seem like the actions of someone else.

Since Sergio De Sousa was working with Laramie Collins and the "heads of the enterprise, he was giving them information that only him, Plaintiff and her lawyer would have, and when this

confidential information would be very clearly passed on to Laramie Collins or other opposing Plaintiff, it would seem to Plaintiff that her lawyer had released that information, when in fact it had been Sergio De Sousa passing said information. This was being done before Plaintiff realized that Sergio De Sousa was involved in the enterprise from the very beginning as evidence will clearly show. This was the plan from the very beginning, to use Plaintiff's husband and tenant to spread lies about Plaintiff's character, and to make her think that she had encountered some huge conspiracy, to intimidate her into giving up and make her sound unstable, except Plaintiff had evidence, and once people spoke to Plaintiff they could see that she was not what they were making her out to be, and this began to make their plan fall apart.

Laramie Collins made it clear that she was working with Sergio De Sousa while she defended herself in small claims court once her attorney Tom Gallagher had figured out what they were doing and refused to continue to represent her, after Plaintiff's daughter's murder, in January 2016.

Laramie Collins was working with Linda Pearson in the conspiracy to set Plaintiff up against the lawyers, while trying to bankrupt her through frivolous and abusive lawsuits, property damage and fabrication of evidence.

Laramie Collins caused damage to the community well twice on purpose, maliciously the first time to force Plaintiff to shut off her water off to get water to the remaining tenants connected to that well, this was done because Rebecca Martin, knowing exactly how the property works, having been the owner of the property and the landlord at Plaintiff's property for 9 years prior to selling it to Plaintiff, she knew that there would be no other way to restore water to remaining tenants, and then sending Laramie Collins to Tom Gallagher of Pisgah legal services lying and saying that the water was shut off to forcibly evict her, which then would cause yet another lawsuit against Landlord, and this time they would be able to sue for the cost of the trailer.

The second time, Laramie Collins caused damage of \$2500 to the well was while Sabrina Diz had Plaintiff locked up in an illegally acquired IVC through perjury, while she was kidnapping Plaintiff's son.

It is clear that she was told how to cause well damage by someone who had inside understanding of how the wells on the property worked and not from her own knowledge because she did not know, and was not told that doing this would fill her septic tank with clear water and that she would not be able to request it fixed because this would prove she had been running her water to purposely cause the well damage effectively damaging her ability to live in her trailer because all her sinks and tubs would be backing up, and her toilet would not flush anymore, and her washer would not work properly, the fact that she knew exactly how to damage well and what that would cause me to do in turn that she could then turn around and sue me for, is a lot more complicated and complex of a process, requiring much more detailed and knowledge than the mere fact that she did not know all that water had to go somewhere.

Once this happened and she found out that she could not have Plaintiff bring someone to fix it she was forced to defecate in her tubs. There are pictures that document the inhabitable condition of the trailer when they left and the use of their tubs as toilets that never drained, filled with urine infested water with fecal matter floating, and fecal matter splattered on the walls and painted across them with their hands. It took two years to get these people off her property even at this level of contempt for any type of civilized behavior and even though Plaintiff never allowed them to move in or got any money from them, or ever wrote a lease with them. They were breaking the law just by moving in. (please see attached documents for detailed account of events. Plaintiff is awaiting the certified file attached to this case but there are 10 cases associated with Laramie Collins through Buncombe County courthouse, as they with Rebecca Martin's help manipulated and abused the lawyers and the system)

Laramie Collins was trespassing and the owner of the trailer, her aunt, who sold the trailer to Linda Pearson's brother and Mrs. Collins live in boyfriend was in violation of landlord-tenant laws and committing a misdemeanor under North Carolina law.

Laramie Collins was involved in this conspiracy against Plaintiff from the very beginning, working with Sergio De Sousa, as outlined in Title 18 racketeering and RICO crimes

Laramie Collins abused the judicial system and used it to harass and hurt Plaintiff for the purpose of advancing the enterprise's agenda.

Laramie Collins conspired against Plaintiff with other enterprise members for the purpose of advancing the enterprise's agenda

Laramie Collins stole thousands of dollars from Plaintiff through rents never paid, property damage lawyers' fees and lawsuits.

## **BRITNEY SHULTZ**

Britney Shultz had been a tenant of the previous owner, Rebecca Martin for two years prior to Plaintiff purchasing the property from her through owner financing.

When Plaintiff purchased this tenant had a 6 month lease that Plaintiff honored per the tenant/landlord laws in the state of NC.

Because of this this tenant had to wait until her lease was up with the head of the enterprise Rebecca Martin before she could begin suing Plaintiff for repairs that she had been living with all along under the previous owner. As soon as Plaintiff's new lease began with Mrs. Shultz almost 6 months after purchase they began lawsuits and other tactics, they were being guided to do against Plaintiff to cause Plaintiff money, trouble and be able to sue Plaintiff as had been previously arranged with Rebecca Martin prior to purchase by Plaintiff. These tactics included,

but where not limited to calling the Sheriff's office for an inspector to come out, complaining about things that were not broken and breaking the hvac.

By the time that these tenants were able to call inspector on Plaintiff under the new lease. She had already repaired major issues they had on her own initiative.

By this time Plaintiff, with the help of a local Buncombe county inspector's advice and guidance, she had brought the entire park up to code and by the time they were able to call Sheriff there were only minor infractions found, which Plaintiff fixed within the time allowed.

While they were suing and calling in inspectors they were also not allowing the contractors to come in to say that Plaintiff was not fixing in a timely manner. Plaintiff had contractors document all this.

Britney Shultz committed fraud on the lease to attempt to get more money from the security deposit that was held by Plaintiff than what she had actually payed.

Britney Shultz was shopping lawyers to be able to further the goal of the enterprise, not only to cost Plaintiff money, but to make the lawyers look bad to Plaintiff and cause a problem between Plaintiff and lawyers.

Britney Shultz was helping the enterprise by libeling Plaintiff on public sites and prevent Plaintiff's business from getting other renters in place of the renters that were being asked to leave, due to the fact, that the park was a meth haven prior to Plaintiff purchasing it, with a meth dealer and prostitutes allowed to remain on the property without electricity and under the squalor conditions that all tenants were living in while Rebecca Martin owned it and received tax credits for keeping her rents low, supposedly helping low income families.

Britney Shultz under the guidance of Rebecca Martin maliciously abused the civil process for her own benefit and the benefit of the enterprise.

Please see attached case file for Britney Shultz. Plaintiff is presently awaiting the certified case file from the courthouse.

This case was used to deprive Plaintiff of her legal right to a trial and push the small claims order through until it became a writ, through the abuse of legal process, and be able to take money directly out of Plaintiff's account right before tax time hoping to force Plaintiff to forfeit on her taxes by bouncing her bank account, and while they were stealing money from Plaintiff through other avenues, and conspirators, such as Stormy Spicer and Sergio De Sousa.

Britney Shultz perjured herself in court for the purpose of advancing the enterprise's goals.

## THE REGENERATION STATION

The Regeneration Station became part of this conspiracy because they saw an opportunity to benefit from what the enterprise was doing to Plaintiff.

They became aware of this opportunity to steal Plaintiff's wormy chestnut wood through "the heads of the enterprise". They were notified that Plaintiff was selling her wormy chestnut wood in the dilapidated barn located on her property, and because the enterprise's goal was to bankrupt Plaintiff by blocking any possible income and costing her money to force her to miss mortgage payments, they could not allow Plaintiff to make the money that selling the wood inside that barn was going to make her which was close to \$15,000.

"The heads of the enterprise" then notified the owner of Regeneration Station to come take the wood and not pay Plaintiff for it, and to destroy the materials left so Plaintiff could not use them to build and save money in the future construction.

Per their own evaluation, Regeneration Station drove away with more than \$12,500 in wormy chestnut wood, they stole an additional \$2500 and caused thousands of dollars in damage to materials that were supposed to be transported from the location of the barn, at the bottom of the mountain, to the top of the mountain where Plaintiff's personal home is located.

They promised an island priced at over \$5000 made of wormy chestnut wood taken from the barn that they never delivered on.

They breached their contract with Plaintiff. They misrepresented themselves and lied about what they were doing.

They priced the wood, so it is very possible that even the estimate is off. They drove off with a pick-up truck bed full to the top of wormy chestnut wood, and never paid for it.

They committed fraud and became part of the conspiracy against Plaintiff, by agreeing to do this even if they were unaware of the Enterprise's goal and agenda, he was aware that Plaintiff would not be able to get justice against him because of the issues the enterprise was causing between Plaintiff and local lawyers, and therefore, he would not pay any consequences for stealing from Plaintiff.

The Regeneration Station additionally caused thousands of dollars in the cost of rectifying the damage they caused.

Regeneration station priced the wormy chestnut wood taken to be valued at \$12,500, they stated that bringing the 53 by 53 barn up to the top of the mountain after taking it apart piece by piece to save the materials to be reused prior to the transport would cost about that much, but that Plaintiff would be short \$5000, that would have to be paid to the guys coming to take barn apart and transported piece by piece from the bottom of the mountain to the top of the mountain.

The contract stated that additionally to the \$12,500 that The Regeneration Station where paying these men to move and save remaining materials, Plaintiff would have to pay them \$2500 when they got there and \$2500 more when it was done.

Regeneration Station then came and took a truck load of wormy chestnut wood, and sent for the guys to take apart barn, who then began to demolish barn, and when stopped from destroying the barn any further and asked what they were doing, their response was that they had not been paid anything at all by the regeneration station, and that they were told to come demolish the barn and the entire demolish cost was the \$5000 Plaintiff was paying.

So, Plaintiff never got paid for the wood, Plaintiff spent an additional \$2500 to lose half the materials left, and when Plaintiff called Regeneration Station to ask for her money, he refused to give her the money or the island that he had sent her pictures of already, that was supposed to make up for the additional \$5000, Plaintiff was paying to bring the material of the barn in good condition to the top of the mountain.

The Regeneration station pocketed all the money, stole the wood from Plaintiff's property, breached the contract, sent a demolition crew instead of the agreed upon crew, costing Plaintiff additional money, destroying materials effectively furthering the enterprises agenda, and lining his own pockets.

## **MCELROY**

This attorney at the day of settlement allowed the closing of the loan to fall apart on purpose and lost Plaintiff the private investor she had been working with for over a year to get the \$30,000 business loan she was ready to receive that day.

It was later clear by the proponderous of the evidence that Sergio De Sousa had told "the heads of the enterprise" and they had requested that he do this to prevent Plaintiff from getting any money which was one of the main reasons for the enterprise, to further the enterprise's agenda and bankrupt Plaintiff for the purpose of getting my property back, but also to begin to set it up to look like Plaintiff was up against some kind of organized crime by attorneys, and not realize that this was all over the actual value of the property she had bought and the fact that it had been sold to her as a scam and that the people who had been promised the property after the Plaintiff was forced to lose it were now ready to take over.

Please see NCSB complaint, attached, this complaint was put together in real time and before Plaintiff realized that there was an ultimate goal behind all that was going on.

## **SERGIO DE SOUSA**

Sergio De Sousa was a main integral part of the enterprise as defined in title 18 Racketeering and RICO chapters.

Sergio De Sousa was sabotaging the business while living with Plaintiff as her husband and father of her child to help the enterprise to achieve their goal.

Sergio De Sousa was giving “the heads of the enterprise” inside information and helping to mislead Plaintiff so that she would not realize who it was that was leading the enterprise and why.

Sergio De Sousa was giving “the heads of the enterprise” information they could use to destroy Plaintiff, personal information about Plaintiff’s life, her family and her children, so they could use this information to steal her property and prevent her from finding out that said property was actually worth over 2.5 million dollars, and not the \$609,000 she had actually paid for it.

It is clear by the evidence that the reason the enterprise did not kill Plaintiff and instead they paid to have her daughter murdered, was because an investigation into Plaintiff’s murder would have included investigating her then husband and that would have led them straight back to the enterprise. So, instead, they used the private family information Sergio De Sousa was giving them to choose the daughter, time and cause of her murder, to keep pointing Plaintiff in the directions of lawyers, since her child had just been sent to see lawyers at the same Pisgah Legal services they had been working very hard to make look corrupt to Plaintiff.

Sergio De Sousa conspired to kidnap his son, knowingly put his son and Plaintiff’s daughters in harm’s way by taking them to Franny’s farm owned by two of “the heads of the enterprise”, even though he was assisting them on how to destroy Plaintiff and he was aware of the fact that they were dangerous and had an agenda against Plaintiff.

Sergio De Sousa was involved in the conspiracy to murder Plaintiff’s daughter and subsequent cover up of that murder by misleading the investigation by detectives of Asheville Police Department with the help of his lover and Plaintiff’s sister Sabrina Diz.

Sergio De Sousa conspired in the attempted murder of Plaintiff with Lou Vega, Sabrina Diz and others, through the introduction of drugs for the purpose of causing Plaintiff to use said drugs and lose everything, and later the attempted dozing of Plaintiff with methamphetamines by Sabrina Diz’s ex-girlfriend and Sergio De Sousa’s friend.

Sergio De Sousa embezzled more than \$60,000 from the business for the purpose of stealing the money and assisting the enterprise to reach its goal of bankrupting Plaintiff, taking child from Plaintiff so he could get child support and force Plaintiff to go fight for son in Florida

Sergio De Sousa stole property that belonged to Plaintiff’s business

Sergio De Sousa working with Adam Bull committed fraud from court house to court house to make it look like Plaintiff’s active custody order had been dismissed so he could take the child

Sergio De Sousa working with Sabrina Diz got rid of evidence of child pornography that Plaintiff and Plaintiff’s daughter who was murdered had found on his computer and phone

Sergio De Sousa working with Adam Bull got evidence taken out of the South Carolina lawyer’s file, so it could not be used against him in the family court in NC.

Sergio De Sousa kidnapped Plaintiff’s son in violation of a custody order that did not even give him overnight visitations due to neglect and the fact that he was considered a flight risk.

Sergio De Sousa is a permanent resident only because he manipulated and used Plaintiff to get his papers for him and has since been using Plaintiff to steal money from her to send back to his country and to keep for himself.

Sergio De Sousa is violent and has committed many acts of domestic violence against Plaintiff

Sergio De Sousa is in violation of Title 18 chapter 7 section 117, by maliciously and purposely not paying child support for over a year to further the agenda of the enterprise he is a part of.

Sergio De Sousa kept child from mother by forcing child to lie about his whereabouts through intimidation of the child and by not letting child speak to mother unless he did as he was told.

Sergio De Sousa put his own child in danger for his own benefit and the benefit of the enterprise

Sergio De Sousa conspired with Laramie Collins, during Laramie Collin's malicious abuse of legal process.

Sergio De Sousa has been conspiring with "the heads of the enterprise" to pay his attorney's fees for family court while continuing to attempt to bankrupt Plaintiff, force her to forfeit on her mortgage and/or on her taxes and intimidate and threaten her into leaving her property, or get an order giving him half and force her to sell.

Sergio De Sousa has perjured himself for the purpose of covering his actions and covering for "the heads of the enterprise" and further their agenda.

Sergio De Sousa committed child abuse when he put his child in danger to further his own agenda and that of the enterprise's.

Sergio De Sousa and/or Sabrina Diz attempted to doze Plaintiff with methamphetamines.

Sergio De Sousa destroyed property belonging to Plaintiff's business to cause her to not be able to run business properly trying to bankrupt her, and to cost her money.

## **ADAM BULL**

Please see attached NCSB complaint against Adam Bull for more detailed information, and other violations aside from those that will be outlined here.

Adam Bull got rid of evidence from attorney's offices, from Plaintiff's court files, and attempted to get rid of documents he received from Plaintiff for her defense, while he misrepresented himself as her attorney, and neglected to let her know he was in a conflict of interest with her then husband, since he had already been working with him, guiding him on how to embezzle the money out of her accounts, hiding damaging evidence for him and assisting him on the plan to kidnap his son.

He would have cost Plaintiff to lose everything if she had given him originals of her post-nuptial, and of her documents against the Regeneration Station, when he refused to return them to further the enterprise's agenda.

He purposely and maliciously worked against Plaintiff while misrepresenting himself as her attorney, and caused her the loss of thousands of dollars against Laramie Collins, and the case against her.

Adam Bull also while conspiring with Sergio De Sousa and the "heads of the enterprise" worked against Plaintiff to continue to make Plaintiff think that "lawyers" were working together to do this to Plaintiff, and point fingers at a grand conspiracy involving Tom Gallagher and Pisgah legal services, the courthouses and DSS, by committing fraud in her court file in Maryland to make it seem like she had no active custody case so that Sergio could take her son, force her to go fight for him in Florida effectively causing her lose her property and make her sound crazy when she fell for their tricks and began accusing lawyers of a grand conspiracy.

Adam Bull working as Plaintiff's attorney contacted previous lawyers with damaging evidence against Sergio De Sousa and requested them to get rid of evidence.

He left Plaintiff without representation on purpose after he purposely went 9 weeks without getting a signature from a superior court judge for the Plaintiff, that ordered Plaintiff's case back into small claims court, where Plaintiff could have defended herself, so she would be forced to appear in district court, where Plaintiff would be obligated to be represented by an attorney he could then force a dismissal of her case by illegally withdrawing as her attorney on the day of court.

He committed many ethical violations, malpractice, negligence and criminal negligence as outlined in the Racketeering and Rico chapters of title 18, as a coconspirator of the enterprise and for the benefit and gain of the enterprise and its agenda.

Please see North Carolina State Bar complaint for details, this complaint was written in real time and prior to Plaintiff figuring out why it was happening. Plaintiff is awaiting the certified files from Buncombe County courthouse, there are voicemails and transcripts that will further prove these claims.

He was involved in the set up and planning of the kidnapping of Plaintiff's son with Sergio De Sousa.

Adam Bull joined and helped the enterprise to make it look like Plaintiff was up against lawyers, to mislead her away from the actual perpetrators and true reason for the enterprise.

Adam Bull committed fraud of legal documents and across state lines by adding a fraudulent dismissal of Plaintiff's active custody case to her Maryland file to make it look like there was no active custody order. He used a fraudulent Judge's signature.

Adam Bull caused or made to be caused evidence in Plaintiff's South Carolina court file and lawyer's records against Sergio De Sousa to be removed from said files for the purpose of assisting Sergio De Sousa to take her child against a court order, to force her to go fight for her child out of state, tampering with evidence that proved Sergio De Sousa was a degenerate and a child pornographer.

Adam Bull kept thousands of dollars for 17 days of representation in which he purposely, maliciously and for the purpose of defrauding Plaintiff as a member and for the purpose of assisting the enterprise in bankrupting Plaintiff.

Adam Bull attempted to intimidate Plaintiff and extort her to force her to sign a release of liability by withholding the \$2500 he later had no choice but to return, emails between himself and Plaintiff, as well as, the courthouse will show that he attempted to lie and blame the courthouse for his actions, again attempting to make it seem like Plaintiff had come across some major conspiracy that involved lawyers and the courthouse.

Adam Bull assisted the enterprise to achieve his own goal of using Plaintiff to attack Pisgah legal services by making it look like he was also working with them, and making it seem like they were working with him in a bigger corruption which had been getting set up by Sergio De Sousa, Laramie Collins and "the heads of the enterprise" for the purpose of misguiding Plaintiff and making her sound crazy as well as tainting the Pisgah legal services reputation for his own pleasure and benefit. As you can see by his own statements in the emails between himself and Plaintiff, he has a personal vendetta against Pisgah legal services and was using the laid out frame work "the heads of the enterprise" were working on, trying to make Plaintiff go after the wrong people for all the things they were doing to her through their manipulation of Pisgah legal Services attorney, who was being manipulated by this enterprise to think that Plaintiff was a bad landlord and were lying and fabricating damages themselves and blaming it on Plaintiff, meanwhile making it seem to Plaintiff that their lawyer was the perpetrator, when in reality it was "the heads of the enterprise" conspiring to set this up, as evidence will prove.

Adam Bull caused or made to be caused the disappearance of the registration of the foreign order of Plaintiff's child support and custody from the Buncombe county courthouse file, so that she could not get her child support from Sergio De Sousa.

## **ASHEVILLE POLICE DEPARTMENT**

Asheville Police Department was negligent in their investigation of Plaintiff's daughter's murder due to the fact that they refused to investigate "the heads of the enterprise" due to their connections, social status and power in this town.

Asheville police Department only investigated the murder of Plaintiff's daughter for only 10 days, 7 of which the girls were missing, and only for three additional days after their bodies were found.

Asheville Police Department allowed conspirators of the enterprise, such as lindia Pearson, who connects to the enterprise through Rebecca Martin and Laramie Collins to make a statement that they then relied their entire case upon, effectively allowing "the heads of the enterprise" and their conspirators to mislead and misguide the investigation away from themselves.

Asheville Police Department helped conspirators through negligence to kidnap Plaintiff's son while her other child was missing, and to convince them of the fact that Plaintiff was crazy and on drugs effectively making sure that they did not follow the leads Plaintiff was acquiring for them, of other witnesses who could have pointed Asheville Police Department into another direction which would have ultimately led back to the enterprise.

Asheville Police Department did not involve the FBI, even though the girls were missing for over 7 days, even though the person they accused of the murder fled the state during the chase from police, was shot by South Carolina State troopers near Spartanburg SC, when the chase began in NC, and even though when he was detained he had the murder weapon of the one person he did kill, and his vehicle which he had acquired during the commission of a felony in NC before being chased into South Carolina, and even though the families were lied to and told that FBI was indeed on the case from the very beginning but they were not.

Asheville Police Department's neglect in this investigation has led to the conviction of an innocent person, and no justice for Plaintiff and her child, and due to their inaction and negligence in investigating what was really going on, it led to the traumatization of Plaintiff's son, the assistance in the kidnapping of said son by his father against an active and established court order, the involuntary and illegal imprisonment of Plaintiff and violation of her rights as a victim and allowed the conspirators access to her bank, her property and her daughter's belongings while these events against Plaintiff took place, and she was held without cause and against her will.

Knowingly or unknowingly they assisted the enterprise to further their agenda against Plaintiff, were fooled and allowed themselves to be fooled on the actual accounts surrounding the murder of Plaintiff's child by taking at face value the statements of the conspirators of the enterprise and ignoring witnesses that did not fit their theory of the crime, which was staged to frame the accused on purpose to connect the girls to drugs and a drug dealer through him.

Asheville Police Department cut all ties with Plaintiff even though she was the victim of this crime as the mother and only responsible and direct relative of the victim to avoid having to take statements that did not fit their narrative of the crime, they changed the time table to fit their narrative, instead of allowing the evidence to guide their findings, they guided the evidence.

Asheville Police Department violated Plaintiff's rights, and mishandled evidence to the detriment of the case. They ignored facts and issues that did not fit their narrative, and refused to investigate people who they felt were well connected and had higher social status.

Due to Asheville Police Department's negligence there is evidence lost forever now, and evidence that they have refused to investigate and/or deal with.

It is Plaintiff's intention that during this civil trial, the court clearly see that the odds of Plaintiff's child having been murdered over drugs and not over the millions of dollars the enterprise was trying to steal from her and the even more money they would have made once their goal was met, are mathematically astronomical, and the fact that this was not investigated as a possible motive for the crime borderlines on the criminal, but is clear evidence of negligence.

## **DSS & CHILD SUPPORT AGENCY**

Kelly Marler a DSS employee assisted in the illegal removal of children from Plaintiff on two separate occasions.

Kelly Marler violated HIPPA laws and Plaintiff's rights under those laws and did so by perjuring herself in court trying to stain Plaintiff's name and assist coconspirator into taking her son out of her safe home to help the enterprise further their agenda

Kelly Marler broke the law to take another child from Plaintiff, she slandered and libeled Plaintiff through fraud and perjury in official documents for the purpose of hurting Plaintiff and taking revenge against Plaintiff for having exposed her perjury to the court, and to further the enterprise's agenda.

Kelly Marler threatened the biological parents of the child Plaintiff was fostering while slandering her to them to force them to abandon their child in NC, even though she had no jurisdiction over this child, and be too scared to return the child, Elijah Davis, to Plaintiff.

Kelly Marler lied about the statements made by Plaintiff's son to keep the child from her, and left child in a dangerous situation which she knew to be dangerous.

Kelly Marler committed contempt while assisting Sergio De Sousa to kidnap his son.

Kelly Marler is a for hire soldier for this enterprise to hurt whistleblowers and/or targets of this enterprise for the benefit of the enterprise and she should not be allowed near children at all.

Kelly Marler committed fraud in court documents

Kelly Marler knowingly and willingly put Plaintiff's child in harm's way for the purpose of furthering the enterprise's agenda

Kelly Marler made Aljah Davis a ward of the state for the purpose of hurting Plaintiff, and slandering Plaintiff's name and getting herself involved in yet a third investigation against Plaintiff's care of her children, all which were dismissed and found to be without cause once Mrs. Marler was removed from her case.

Kelly Marler is abusing her power, the position which she holds is to help families and children, but she enjoys hurting people, she is on call to hurt anyone the enterprise asks her to hurt with no regard to the law or to the families and children she is hurting.

Kelly Marler is being allowed to do this by her supervisor, and both need to be investigated and all the families they have destroyed need to be reevaluated for cause.

Kelly Marler has used illegal tactics in her attempt to hurt Defendant, including but not limited to coercion, intimidation, threats and slander.

Kelly Marler has stained Plaintiff's DSS record with her lies which are now being viewed as true just because she has added them to Plaintiff's DSS record.

Kelly Marler kidnapped a child from a tenant, Stormy Spicer, and threatened to permanently take her child away unless she, Stormy Spicer, did things to hurt Plaintiff and help further the enterprise's agenda. (see Stormy Spicer's statement of claim) Because she was doing this, she is also guilty by extension of mail theft, embezzlement and property theft and damage, as well as kidnapping, fraud, and all other allegations made against her and Mrs. Spicer which evidence will clearly prove as true.

DSS has been negligent in supervising these women and making sure that women with the power to take children out of homes and destroy families are well vetted, well supervised and under some type of control so they cannot abuse their power as this social worker has.

Additionally, child support agency has refused to give Plaintiff the child support owed to her by Sergio De Sousa, also assisting, knowingly or unknowingly "the heads of the enterprise" to further their agenda, against Plaintiff by violating her civil rights, and even against North Carolina Law. (See attached) More evidence will be presented at trial, no matter how much Plaintiff tried to get her child support even when Plaintiff contacted the state agency, she was informed that the DSS in Asheville is one of the

most corrupt agencies in the country and that they do this as a way to attack those they are asked to attack. If this is the case, and it has been the case for Plaintiff, then the federal government must be called into action because this could be the most prejudicial agency in the country and if they can kidnap children and hurt children to silence opponents then we have left a socially developed society and entered a society without rights, where fear for our children keep those without power silent of the atrocities being committed against them.

As evidence will show Kelly Marler's abuse of power and total disregard for the law destroyed a family and put children in danger and the saddest part is she got pleasure from doing it, as evidenced by her laughing at Plaintiff when Plaintiff called her actions for what they were hurtful, evil and detrimental to the care and wellbeing of the children, as well as, illegal.

There is nothing more prejudicial to justice than an agency such as DSS, whose responsibilities are the protection of our children and who instead use their power to hurt the children of those seeking justice for the purpose of silencing them or controlling their actions. This is child abuse, but it is also Human trafficking for their own agendas and it is imperative that people like Kelly Marler and her supervisor, and those in the child enforcement agency are investigated and those involved lose their jobs, are never allowed into positions like these again, are fined and incarcerated as needed to protect those children and all the families and children they took are reevaluated by outside forces, to make sure that good cause was met.

## **MISSION HOSPITAL & MISSION MY CARE PLUS CANDLER**

Two nurses working under Mission hospital and its subsidiaries have maliciously and purposely committed malpractice against Plaintiff for the purpose of causing her to get sick, be in physical pain, hoping to cause her to break the law and the practices patients rules out of desperation, in a way that would assist the enterprise in furthering its agenda and reaching its goal of removing Plaintiff from her land at any cause.

Plaintiff cannot give the name of the nurses because Mission has refused to give me their names or their license numbers so Plaintiff can file an official complaint with the Board of Nurses and other associations that oversee medical care and Hospital responsibilities.

### **NURSE ONE:**

Nurse number one, working under the capacity of Mission My Care Plus, caused or made to be caused problems with her medications, controlled substances, regulated by federal government were withheld from Plaintiff, not renewed properly, were misprescribed on purpose at higher dosages and then cut off abruptly in an attempt to cause Plaintiff physical pain, cause problems between Plaintiff and her doctor, who she had been seeing without a problem for almost three years by then.

Nurse one was doing this to cause Plaintiff to be short on her medications forcing her into unnecessary physical withdrawals, the inability to work due to pain, in hopes that in her

desperation she would lose the control over her medications and feel forced to go outside her doctor's office to get the medications and resort to other controlled substances that could and would ruin her life and give them an opportunity to dismiss her from the practice, leaving her with no doctor and no medicines for her chronic illness, which is severe and very painful.

Plaintiff's doctor at Mission My Care Plus had to begin to inform Plaintiff of when she planned on going on vacations, so she could leave Plaintiff's medications taken cared for while she was gone so that they could not withhold care and medicines from Plaintiff, or force Plaintiff to see another practitioner in the practice and have them dismiss Plaintiff from the practice behind her doctor's back.

This abuse of power, and malicious malpractice and violations of Plaintiff's rights went on for almost an entire year and are well documented

**NURSE TWO:**

Nurse number two was a nurse at the NICU at Mission Hospital who reported abuse of Elijah Davis for the purpose of kidnapping a second child from Plaintiff with the help of DSS worker Kelly Marler for the third time being used against Plaintiff, to hurt Plaintiff, and stain her name and reputation, while gaining money from the state themselves for taking another child, even though they did so, illegally, through lies and corruption as described under the statement of claim for Kelly Marler

This nurse illegally made a report of abuse against ALL the doctors' findings, which stated that no signs of abuse were present, and even though her license does not allow her to do that, this nurse reported false allegations of abuse while Plaintiff was in the hospital to help DSS worker Kelly Marler to once again hurt Plaintiff by abusing her power for the benefit of the enterprise.

**MISSION LAB:**

Additionally, someone at Mission violated HIPPA laws by disclosing HIPPA protected lab results to DSS worker Kelly Marler, who then in turn perjured herself to use this protected information against Plaintiff in court and to make it part of her DSS record for the purpose of preventing Plaintiff from being able to help children, and foster Elijah Davis and to cause Plaintiff to lose her son to his father, once again in an attempt to force Plaintiff to go fight for her son in Florida and help the enterprise to achieve its goal of taking Plaintiff's property in the process.

**MISSION HOSPITAL DOCTOR:**

Additionally, the only doctor who was willing to misdiagnose Plaintiff with a mental illness, effectively destroying her life, trying to lock her up for two weeks while "the heads of the enterprise" took her property from her, while they try and force unnecessary medications on Plaintiff that would have caused her to get seriously sick, was also from Mission hospital. This is an unspecified defendant for now, and will be added as needed, but this doctor went beyond malpractice into what Plaintiff would consider attempted murder and malicious negligence.

Plaintiff could have had a very bad reaction, had she been forced to take unnecessary psychotropic medications, medications that have in the past caused Plaintiff to have very bad reactions to, due to the fact that she has no mental illness, that she does not need those medications and that she has a severe chronic illness that could have had a severe reaction to those medications.

This is further evidence of the amount of power, money and connections these "heads of the enterprise" have, and how invested they were in getting Plaintiff's property back. This is also further evidence that with all the enterprise was doing against Plaintiff from every direction, that her child's murder was also connected to this.

### **MCINTOSH LAW FIRM**

This law firm took out a lawsuit against Plaintiff, which had been dismissed voluntarily by them through a South Carolina district judge with prejudice in 2012, and filed it against Plaintiff again in 2016, at the request of one of the enterprise conspirators and for the purpose of negligently assisting the enterprise to further its agenda and accomplish their goals of bankrupting me by preventing me from being able to take out loans due to this judgement which was brought against me through malpractice.

This was done to further the misdirect towards some large conspiracy of lawyers, that when Plaintiff began to claim it as such, would help the conspirators of the enterprise say she was delusional and crazy.

This is further evidence of the amount of power, money and connections these "heads of the enterprise" have, and how invested they were in getting Plaintiff's property back. Under these circumstances anyone would have thought the same as Plaintiff when her child was murdered.

Please see attached South Carolina order from 2012 and attached North Carolina order in 2016. Request of Certified files pending arrival.

It is Plaintiff's intention that when the court see that, so many attorneys were manipulated by this enterprise, due to their power and social status, and that these attorney's lack of ethics and professionalism used against Plaintiff, that the court also realize that the North Carolina State Bar is not doing their job correctly and since they no longer answer to anyone, because they have become a non-profit organization, that these lawyers and the NCSB, lack the oversight needed. According to NCSB, they lack the power and ability to investigate these complaints and follow up on all that is being done, and they don't answer to anyone, so that no one is policing lawyers, and making sure they follow their ethics laws. Plaintiff hopes that the court agree that it is necessary for the NCSB to answer to someone other than themselves, and like all other organizations they need to be part of the checks and balances that are the backbone of our country, by not being a non-profit organization and instead becoming a state agency answering to a federal agency as it should be and was in the past.

Had the Plaintiff been able to get an investigation by NCSB of all these attorneys actions, the NCSB could have uncovered the enterprise long before Plaintiff did, and her child's murder may have been prevented.

### **STORMY SPICER**

Miss. Spicer was Plaintiff's tenant, who according to Mrs. Spicer, Kelly Marler of DSS was refusing to allow her access to her daughter unless she helped to hurt Plaintiff, after she was caught driving under the influence from her home to her mother's home inside Plaintiff's property.

"The heads of the enterprise" then promised Mrs. Spicer that once she helped to bankrupt Plaintiff they would let her have her child back, and let her own the trailer she was renting from Plaintiff.

Stormy Spicer and her boyfriend stole thousands of dollars from Plaintiff's bank through the purchase of unnecessary materials and stole materials as well after Plaintiff's daughter had been murdered and unbeknownst to the enterprise and even to Plaintiff, the child still had an active life insurance policy which prevented Plaintiff from becoming bankrupted by her child's murder and Sergio De Sousa's embezzlement. Now, knowing that Plaintiff had received this money, and that this money was preventing "the heads of the enterprise" from achieving their goal, they used and manipulated this tenant to steal that money from her account.

Stormy Spicer's boyfriend connects back to Laramie Collins and Rebecca Martin by last name and relation.

Stormy Spicer also stole Plaintiff's mail for a few months while Sergio De Sousa's attorney mailed Plaintiff's court notices, subpoenas ext., to the mailbox instead to her post office box. This was so Plaintiff would not be prepared for court, and would not get subpoenas and court documents and prepare a defense against their attacks, and once again to make it seem like attorneys were purposely working against Plaintiff and that DSS and police were all also involved, when all "the heads of the enterprise" needed was to have ONE person in each agency to make it seem like that. They were hoping that this would intimidate Plaintiff away from the fight for her property, and if Plaintiff continued to fight, she would sound delusional when she pointed her finger at such a huge conspiracy against her, but as evidence will show the enterprise was not made up of a huge conspiracy of people and agencies as they made it seem, but better yet used a handful of people to make it look that way.

Stormy Spicer did in fact, months later, return the mail to Plaintiff.

### **LOU VEGA**

Lou Vega was part of the enterprise, and was aware of the enterprise and its agenda. Lou Vega working with others associated with him, unspecified defendants at this time, and Sergio De Sousa attempted to set Plaintiff up to relapse and do drugs, even though Plaintiff had at that time 12 years sober. The only way they could have known about Plaintiff's past was through Plaintiff's own then husband, Sergio De

Sousa. When they could not force Plaintiff to relapse and throw her life away, they then set it up to make it appear as if she did anyways, so that Sabrina Diz could then kidnap Plaintiff's son.

Lou Vega left thousands of dollars in damage that was purposely done by him to attempt at causing Plaintiff trouble with paying either mortgage or taxes.

Lou Vega's girlfriend set up Plaintiff's Go Fund account during the disappearing of Plaintiff's daughter, for the purpose of being able to later access it and close it down.

Lou Vega sent in someone that he referred to Plaintiff, as someone who could help Plaintiff in her farm, during the disappearance of her daughter, for the sole purpose of interjecting someone into Plaintiff's life and property that could inform him and therefore the enterprise of Plaintiff's actions, continue to feed Plaintiff misinformation about who was behind all that was happening to Plaintiff and help to kidnap Plaintiff's son, while furthering the agenda of the enterprise by destroy her farm and killing her animals.

Lou Vega was working with "the heads of the enterprise", and co-conspirators Sabrina Diz and Sergio De Sousa.

The evidence against Lou Vega and unspecified associates will show that he was a co-conspirator of the enterprise, and played a major role in the enterprise's agenda and activities, including but not limited to Fraud, information gathering and dispersing, conspiracy to kidnap a child, conspiracy to commit murder by trying to get Plaintiff involved in drugs, property damage, libel and slander and obstruction of justice.

## **SABRINA DIZ**

Please see attached affidavit by Plaintiff for details about this part of the statement of claim detailing Sabrina Diz's involvement and actions for the enterprise.

Sabrina Diz working as a conspirator of the enterprise committed perjury to false imprison Plaintiff in a hospital for the purpose of kidnapping her son for the other conspirator Sergio De Sousa

Sabrina Diz destroyed evidence Plaintiff had against The Regeneration Station and Sergio De Sousa during the kidnapping of Plaintiff's son.

Sabrina Diz maliciously abused the civil process to further the enterprise's agenda

Sabrina Diz conspired to kidnap Plaintiff's child

Sabrina Diz conspired to set up Plaintiff

Sabrina Diz conspired in the attempt to steal the property from Plaintiff worth over 2.5 million

Sabrina Diz endangered the life of a minor

Sabrina Diz committed a breaking and entering act, to access Plaintiff's child

Sabrina Diz assaulted Plaintiff's mother for the purpose of removing the child from her care

Sabrina Diz made false reports to DSS

Sabrina Diz committed fraud

Sabrina Diz libeled and slandered Plaintiff for the purpose of advancing the agenda of the enterprise and mislead the investigation into her daughter's murder

Sabrina Diz obstructed justice by slandering Plaintiff to the detectives charged with investigating her daughter's crime

Sabrina Diz took belongings from Plaintiff's house and Plaintiff's daughter's house that did not belong to her

Sabrina Diz cyberstalked Plaintiff and is still cyberstalking Plaintiff and assisting the enterprise with information from Plaintiff's Facebook site by taking a false identity to do so.

Sabrina Diz was assisted by a conspirator Adam Bull on how to file charges with no evidence and false reports and through perjury

Sabrina Diz assisted in the fraud perpetrated to Go Fund to close the Go Fund account I had taken out for a better investigation into Plaintiff's daughter's murder to help the enterprise prevent Plaintiff from acquiring any funds while they attempted to bankrupt her.

Sabrina Diz committed an additional fraud against Go Fund, when she took out a second Go Fund account herself through lies and libel of Plaintiff claiming to need money for one thing, when she was in fact getting money to travel back into North Carolina to take out fraudulent charges against Plaintiff.

Sabrina Diz committed fraud by accessing Plaintiff's online banking, her Facebook account and her mail from her post office box while she had Plaintiff falsely incarcerated.

Evidence will show a pattern of behavior by Sabrina Diz against Plaintiff for the purpose of ruining Plaintiff's life.

Evidence will show that on the day Plaintiff was released from jail in 2004, Sabrina Diz made a false report attempting to have Plaintiff reincarcerated by violating her parole, police refused to arrest Plaintiff because they saw that Sabrina Diz was lying and were able to see what she was trying to do.

Evidence will show that Sabrina Diz attempted to incarcerate Plaintiff again, on the day Plaintiff was leaving the state of Florida with her family for the state of Maryland, this time calling police with a false report to the Plaintiff's address, attempting to make her violate her parole by getting arrested through Sabrina Diz's false allegations and police again refused to arrest Plaintiff and instead removed Sabrina Diz from Plaintiff's property.

While Plaintiff was incarcerated Sabrina Diz had temporary guardianship of both Plaintiff's daughters and she was trying to get rid of the now deceased child, but because then she would have had to send both children to New York because Plaintiff refused to separate them, and this would prevent Sabrina Diz from being able to do her taxes claiming both girls, she did not do this. Plaintiff was in jail for only 7 months, not all in one year but separated within two separate fiscal years although consecutively, but Sabrina Diz lied and claimed the children for the whole year of 2003 because Plaintiff was unable to fight this from jail.

These patterns of behaviors where Sabrina Diz greatly disliked Tatianna Diz, the Plaintiff's now deceased daughter, and the reason for which Sabrina Diz had to obstruct justice during the investigation into her murder, will give probable cause for an investigation into the involvement of Sabrina Diz in the murder of Tatianna Diz and subsequent cover up and obstruction of justice into her murder investigation.

Additionally, Sabrina Diz was trying to convince Tatianna Diz that her mother hated her, but after only living with her for two months threw her out on the streets of Miami, and it made Sabrina Diz blind with anger that she then called the Plaintiff for help and cut off her aunt Sabrina Diz from her life. Plaintiff had sent Tatianna Diz then 8 months shy of her 18<sup>th</sup> birthday, to stay with her aunt trying to prevent her daughter from being out on the street before she was a legal adult, and Sabrina Diz had agreed to take care of her until she turned 18, and she had agreed that if she was unable to do so, she would return the minor child to Plaintiff her mother. Not only did Sabrina Diz violate this agreement by throwing Plaintiff's minor child on the street, but she didn't tell Plaintiff her daughter was living on the streets. Plaintiff only found out that her minor child had been on the streets, when her child called Plaintiff and told her asking Plaintiff to come back home. This greatly angered Sabrina Diz, who was hoping she had severed the relationship between Plaintiff and her daughter permanently.

Evidence will show that when Sergio De Sousa almost killed Plaintiff by beating her up, during a domestic violence assault, in Maryland, it was the home of Sabrina Diz that he moved into, and it was then that their on and off affair began, mainly out of hate by Sabrina Diz to Plaintiff, which will be very well documented during the trial, and because Sabrina Diz will do anything to hurt Plaintiff, including hurt a niece that had seen her for what she really was, and would not do as she wanted and leave her mother, Sabrina Diz would gladly help further the agenda of the enterprise, if only for the soul purpose of hurting Plaintiff out of hate.

Sabrina Diz committed fraud on court documents.

Sabrina Diz was maliciously and purposely defaming Plaintiff's character for the purpose of obstructing the investigation, covering for the enterprise and helping the enterprise steal Plaintiff's property and to finally accomplish her desire of destroying Plaintiff's life.

Sabrina Diz allowed an unspecified defendant to misrepresent himself to media and police as Plaintiff's daughter's stepfather for the purpose of advancing the enterprise's objectives

For more details of all of the actions taken by Sabrina Diz during the violation that can best be described by Title 18 Racketeering and RICO chapters, please see attached affidavit.

There are unspecified defendants that were involved in the kidnapping with Sabrina Diz, but it was only her that had it planned ahead of time with Sergio De Sousa and other enterprise conspirators.

## GENERAL SUMMARY

Rebecca Martin sold Plaintiff a property for a lot less than it was worth to scam her out of close to a quarter of a million dollars while she waited for Francis and Jeff Tacy to finish defrauding the USDA for the government funds they were stealing to purchase their adjoining 18 acres.

Francis and Jeff Tacy were buying their side with the expectation of buying up all the land between them and Plaintiff including Plaintiff's land and becoming a luxury wedding resort, they never planned on becoming sheep farmers as was the reason they were first getting the USDA loan.

Rebecca Martin through her connections in this town and her social status and the tenants who had known her for years in the park being purchased by Plaintiff, which was a drug haven while under the ownership of Becky Martin, was ready to begin lawsuits and bankrupt Plaintiff as soon as Francis and Jeff Tacy were ready.

Rebecca Martin manipulating both Pisgah legal services and Plaintiff by conspiring with Plaintiff's then husband Sergio De Sousa began lawsuits and began to create a battle between Plaintiffs and the lawyers, using the inside knowledge Sergio De Desousa was giving her to make it look like Plaintiff's lawyers were breaching confidentiality laws and then turning around and feeding the tenants the information they needed to make it seem to the lawyers like Plaintiff was a slum landlord and make them want to defend their clients beyond what was acceptable by ethics, especially when it seemed to them, that Plaintiff was accusing them of doing things they were not doing, even though from Plaintiff's side it looked like it was them, from their side it looked like it was Plaintiff.

Plaintiff's husband Sergio De Sousa was working very hard to also feed this lie while Plaintiff still trusted him and did not know yet he was involved in the enterprise or that this enterprise existed at all or the purpose of the enterprise yet. Plaintiff was still unaware of the value of her property yet.

Rebecca Martin was Plaintiff's mentor in this venture, and Plaintiff trusted her and her own husband completely at this time, and they used and manipulated this trust to the fullest to feed Plaintiff misinformation and make her believe that she was up against an organized criminal enterprise of lawyers.

Because Plaintiff was following every law and doing everything right, she made sure to bring the park up to code right away. This confounded with the fact that Plaintiff treated everyone with respect and was helping people, soon it was impossible for Rebecca Martin, Francis and Jeff Tacy to bankrupt Plaintiff even with the inside help of Sergio De Sousa, who was attempting at making Plaintiff look bad to her tenants and others, Plaintiff's actions began to show people that they were being fed erroneous information about Plaintiff.

Once Plaintiff received the settlement that she had been working on for an injury at her husband's employer's they had to resort to more personal tactics of attacks, especially since Sergio De Sousa owed that money to Plaintiff and he did not want to have to give it to her.

Plaintiff and Sergio De Sousa received the \$105,000 in March and Sergio De Sousa had embezzled it all out of her bank accounts by June 2015, in three months, while Laramie Collins at the guidance of Rebecca Martin and with the help of Sergio De Sousa kept Plaintiff so busy through court that she could not notice right away.

Once Plaintiff realized what Sergio De Sousa was doing, she threw her husband out even though he begged to stay. This money is still missing, and it is part of the evidence of embezzlement that Plaintiff will show in this case.

Since Sergio De Sousa was involved with these people killing Plaintiff was not an option because he would have gotten investigated for that murder and it would have led police right back to "the heads of the enterprise", so using the information only Sergio De Sousa had about Plaintiff and her family and the fact that Plaintiff had a trouble past with addiction they realized they had to go another way. Since taking all of Plaintiff's money out of her bank account, destroying all her equipment, stealing the work truck and leaving her with no help with the help of her then husband Sergio De Sousa did not work, and they no longer had anyone they could file lawsuits against Plaintiff with, they planned on kidnapping Plaintiff's son and having his father take him to Florida to force Plaintiff to go fight for him over there.

Sergio De Sousa decided to accept the settlement in January of 2015, we received the settlement in March of 2015, evidence shows he contacted Adam Bull in February of 2015 and by June of 2015 Sergio De Sousa had embezzled all the money out of Plaintiff's business accounts, at which point Plaintiff threw Sergio out of her house in mid-June, he was told to leave for Florida in July and he expected to come get Plaintiff's son out of school in September and take off with him to Florida.

This is when Adam Bull comes into the picture in February of 2015 to guide Sergio on how to embezzle the money and destroy Plaintiff's business and kidnap his son legally, this is why they needed to add a fraudulent dismissal of the still active custody order in Maryland.

It is clear when speaking to the child that while spending time with his father, Plaintiff's child must have overheard something about their plans to kidnap him, and he was terrified that his father was going to kidnap him, but because Sergio had left Plaintiff with no money and she was barely making her bills, and could not afford to pay for private school any more, compounded with her child's fear, Plaintiff decided to homeschool her child.

When they saw that there would be no way to reach Plaintiff's son the way they had planned once school started in mid-September and they saw that child would not be attending school, that the lawsuits for two years did not work, that taking all of Plaintiff's money did not work to get her to forfeit on her mortgage or her taxes, and that Plaintiff found a way to continue to run the business alone and without tools or materials, on October 27<sup>th</sup> Plaintiff's daughter went missing and opened up the opportunity for Sergio De Sousa to get Plaintiff's sister in the area and with the help of Lou Vega make it look like Plaintiff was crazy and on drugs so they could take the child anyways and cause another opportunity to break Plaintiff and force her to forfeit on her mortgage or taxes again.

As evidence will clearly show, Plaintiff's daughter's murder was the culmination of everything the enterprise had been working towards for months. Making Plaintiff think lawyers were behind her daughter's murder to make her sound crazy, setting her up to look unstable, violent and on drugs by her sister to obstruct the investigation and lock Plaintiff up while causing more property damage and kidnapping her son, trying to force her into bankruptcy or to relapse and give up. In fact, when none of these tactics worked either, and Plaintiff had navigated it all clean, and gotten her son back, and still paid her mortgage and taxes because of her daughter's life insurance policy, Mr. Tacy was so upset by this that he tried to run Plaintiff off the road with his car with a witness in the car with her, and then Mrs. Tacy began to lie and take out charges against Plaintiff herself too, attempting to continue to use the court to hurt Plaintiff.

As had been pre-agreed as soon as Sabrina Diz arrived, working with Lou Vega on the pre-agreement between him and Sergio, they began to set Plaintiff up for the kidnapping of her son. The first attempt at this was by trying to get Plaintiff into a physical altercation on 11/1/2015 at which time they planned on calling the police on her and having her arrested, except Plaintiff was so focused on finding her daughter, she just walked away from them. The second attempt was done by calling in a false report on 11/2/15, at which time Sheriffs were sent out with a social worker on call, they found Plaintiff to be safe and not on drugs, and labeled the report as a false report. The third and last attempt was then put into action by having Sabrina Diz take out an IVC under perjury at the courthouse, to have Plaintiff removed from the house under order of the court, hoping that the social worker they had on stand by this time would just be given Plaintiff's son when Sheriffs came to get her for said IVC and the child was left alone in the house, but since Plaintiff's mother arrived to Plaintiff's house just in time, Sheriffs left her son with Plaintiff's mother instead. This forced Sabrina Diz to have to find yet another way to kidnap the child, so Sabrina Diz accompanied by other unspecified defendants, at this time had to break into Plaintiff's home and had to assault Plaintiff's mother to forcibly remove Plaintiff's child from the care of Plaintiff's mother and out of Plaintiff's home. At this time, Sabrina Diz attempted to have Plaintiff's mother arrested as well by calling in another false report on her. When Sabrina Diz realized that Plaintiff's mother was not going to get arrested, she had to take Plaintiff's son to a hotel room and hide there until Sergio De Sousa came into town to take him away against a court order. This was all done with the help of the social worker they had in place to help to do this.

Once Plaintiff was evaluated and released because there was no mental illness or drug abuse, and Plaintiff did not own any weapons and it was clear that there was nothing wrong with her other than grief for her now deceased daughter, they had already removed Plaintiff's child from the state and were hiding him from her. This is when they began attempting to get Plaintiff to go file for custody in Florida. Except Plaintiff knew she had an active custody order case in Maryland, this is when Plaintiff becomes aware of the fraudulent dismissal that was added to her Maryland file to try and prevent her from being able to have the NC court order her child returned to her. When Plaintiff speaks to Maryland and they realize what has happened they remove the fraudulent dismissal from the file and tell Plaintiff that her custody and child support order are very much active still. Plaintiff has those documents to show the fraudulent judge's signature, and the fraudulent stamp trying to make it look like it was filed back in March of 2010, also done to erase the debt owed by Sergio De Sousa for child support there. Plaintiff also finds a copy of the fraudulent dismissal amongst documents that Sergio De Sousa leaves behind at the house, that he had this fraudulent document prior to leaving, which is without a stamp and could

only have been given to him by Adam Bull while they planned the kidnapping prior to him receiving the settlement money.

At this point it had been two years since they had been trying to bankrupt Plaintiff, please see timeline attached for a chronological list of events.

The attacks continued for two more years after Plaintiff's daughter's murder and subsequent son's kidnapping, as they paid for Sergio De Sousa's attorney to try and bankrupt Plaintiff through family court, buy time to keep stealing money and continue to cause property damage, and to use the divorce to take Plaintiff's property and/or child.

When Francis and Jeff Tacy saw that nothing they had done had worked to get them the property they began to attack Plaintiff directly themselves through abuse of legal process, threats, trying to run Plaintiff off the road, theft, violence ext.

Using the same DSS worker they used to kidnap Plaintiff's son, Kelly Marler, they tried once again to take Plaintiff's son during the family court case, by using Kelly Marler to testify in court while lying under oath against Plaintiff to attempt to make her look bad to the judge and manipulate the judge into ordering the child sent to live with his father. The enterprise later used this same DSS worker again to take yet another child from Plaintiff, and to stain her DSS record, and try once again to have her remove her biological son from her care, all to cause Plaintiff emotional pain to the point that she would not be able to function and keep her business afloat, but also still trying to make it seem to Plaintiff as if she was up against some huge conspiracy against her, except by now, Plaintiff had begun to realize what was going on, that her property was actually worth millions, and that they were using the same people against her over and over and so it was not all these agencies were corrupted, and lawyers against her, but that there was a handful of people working very hard to make it look that way to her.

Using Lou Vega, again around tax time, they caused property damage of close to \$10,000 killing animals and destroying other ways in which Plaintiff made income, poisoning her AKC puppies so she could not sell them ext., to try and force her to forfeit on her mortgage and/or taxes, this did not work either and somehow, Plaintiff continued to successfully run her business and pay her bills.

This is why Plaintiff has brought this suit to Federal Court where Plaintiff can clearly show through evidence the whole picture of what has been done to her by this enterprise working together for their own individual benefits but for the ultimate goal of the enterprise to acquire her property.

As you can see the property was put on the market for \$2.5million dollars. Plaintiff has recently lowered the acreage to only 8 out of 21.73 ac for a total value of \$1.7million while keeping 12.73ac, immediately Rebecca Martin began attempting to foreclose on Plaintiff for paying a few days late per month, even though all Plaintiff owes her now is around \$540,000.

This is a very short statement of fact, the affidavits and evidence will show that this was a constant attack for over four years, that was so painful to endure Plaintiff can only imagine there were angels at her every turn, and that there IS a God protecting her from these evil and greedy people. This conspiracy against Plaintiff has been so complex, so evil and injurious that Plaintiff believes that there is plenty of reason to believe that her child's murder had something to do with everything else they had been doing to her and continued to do to her afterwards, even up to present time. Plaintiff deserve justice. Plaintiff's daughter deserves a better investigation into her murder, and Plaintiff's child deserves real

justice and for the real murderers to pay for their crimes. Plaintiff's son deserves justice for what his father and aunt and DSS worker, helped the enterprise do to him for their own benefit and gain without regards to his safety or to his mental health as he grows up. He also deserves to be protected from further injury by his father.

Through all the tactics listed throughout this Statement of Claim, that Plaintiff plans to clearly prove through evidence and testimony at the trial, the members of the enterprise have caused an actual monetary loss of over \$250,000 from me in the last four years, this money would have quadrupled Plaintiff's income by itself had she been able to invest it into her property and the dream that she was trying to build. The actual amount of losses is immeasurable due to the fact that by quadrupling Plaintiff's income, there would have been more money to invest and more money would have been made from that. Also, the immense amount of work that Plaintiff has had to put into defending herself from lawsuits, into rebuilding all the damages caused, into having to search for help and study laws to be able to defend herself, all those hours that were taken from Plaintiff's business and her personal dream she was trying build to help a lot of people are immeasurable as well. The stress, the pain and the lack of peace and stability caused by this enterprise is also immeasurable. The fact that Plaintiff has had to live struggling alone with her son, when in fact she should have been in a comfortable social status is additionally immeasurable. The fact that this has divided and broken up her family, that her daughter is gone, that her other daughter was forced to betray her mother out of fear, and Plaintiff could not be there for her grandchild's birth, while her child is surrounded by people who have hurt her, her sister, brother, grandmother and mother and she is too scared to accept it, all over a piece of land, over money, is beyond evil, and Plaintiff hopes that the court agrees that these people not only have to pay a monetary consequence, but Plaintiff hopes that the court also agrees that a better investigation into their actions needs to take place so that criminal charges can be taken out against them and they can pay more appropriate consequences for their criminal activity as well.

Since there were many conspirators, even though the main enterprise was not comprised of everyone who assisted them, Plaintiff has broken up the Statements of claim into parts for each.

There are unspecified defendants at this time, and Plaintiff reserves the right to add and amend defendants later as needed.

#### **IV. RELIEF**

Plaintiff respectfully requests that FBI join me in this matter, and open an investigation into this enterprise and the murder of one of my children and kidnapping of my son.

Plaintiff respectfully request the court grant a monetary relief from all defendants collectively for punitive damages, pain and suffering and amount of time spent working on these unnecessary and uncalled for defenses during the malicious abuse of civil process perpetrated by head of enterprise Rebecca Martin and her codefendants for the past four and a half years.

Plaintiff would humbly request that Your Honor order mortgage payments to be paid to the courthouse until all these matters are resolved.

Plaintiff requests that Your Honor order that all the money that was taken through fraud, and abusive and predatory tactics be returned with interest.

That the courts order a cease and desist of all related activities against Plaintiff and order a full investigation of Rebecca Martin, and Mr. and Mrs. Tacy's financial transactions, lending practices, real estate withholdings and loan applications, and freeze any and all abusive and predatory transactions immediately and that they be ordered to pay back any and all moneys acquired through these illegal activities.

That those who are proven to be abusing their positions of power or trust such as the DSS worker Kelly Marler and supervisor at the child support agency, as well as the nurses at Mission, be removed from those positions, and if applicable their licensing for performing those positions be removed, revoked and their employment terminated for the protection of the public.

Plaintiff humble requests that a criminal investigation against Rebecca martin, Francis Tacy, Jeff Tacy, Sergio De Sousa and Sabrina Diz be opened to ascertain whether the murder of Plaintiff's daughter was connected to their activities of Racketeering and RICO, and the massive amount of money they were losing at their failed scam against Plaintiff, and their failed conspiracy against her which must have also cost them money.

Plaintiff requests that Your Honor agree that "the heads of the enterprise should be collectively found to be responsible for all the actions of the conspirators because it was to their benefit, and because of them that this occurred at all, and that this enterprise was created therefore becoming guilty of all crimes committed by the codefendants by extension.

Due to the fact that there have been three attempts at Plaintiff's life that she can prove in court, Plaintiff requests that your honor accept her request for a proxy, so if something were to happen to Plaintiff, that one of the listed proxies could continue this case without Plaintiff but for the benefit of her children and justice.

Plaintiff also request that the proxies' names be sealed until they are needed if it ever where to get to that point, and that if Plaintiff's life or freedom is taken from her and a proxy is needed that Your Honor immediately order an investigation into the facts surrounding said loss of life or liberty.

Plaintiff respectfully asks that if anything happens to Plaintiff, that Your Honor assign an attorney to one of my proxies as outlined in my sealed Motion attached with this complaint, and immediately order an investigation into the heads of the enterprise and main conspirators while continuing this case against them.

Plaintiff also request that your honor put forth an interlocutory order to Asheville Police Department, Mission Hospital and Buncombe County Courthouse to cease and desist any abusive or neglectful activities against Plaintiff, and that any violation of Plaintiff's rights will be fully investigated if they occur in retribution to Plaintiff's filing of this case.

Plaintiff respectfully requests that Your Honor order that Mission must maintain their responsibilities towards Plaintiff as their patient, and avoid maliciously messing with Plaintiff's medications, or withholding medical care from Plaintiff; letting Buncombe County Courthouse know that they should carefully review any claims against Plaintiff prior to neglectfully moving forwards against Plaintiff, especially if those claims are by any of the named members of the enterprise, or cease and desist accepting claims against Plaintiff by any of the members of the enterprise.

Plaintiff respectfully requests that DSS clean her record of any and all lies added by Kelly Marler and amend said record to be a better reflection of the truth.

Plaintiff respectfully request that Your Honor order DSS to come clean to Elijah Davis' biological parents and return Elijah Davis to Plaintiff as was the desire of his biological parents for Plaintiff to raise Elijah Davis as her own.

Plaintiff respectfully requests that Your Honor order an Federal oversight agency for the North Carolina State Bar, and an easier process for complaints against attorneys.

Plaintiff also requests that attorney McElroy pay restitution and relief for the money he caused Plaintiff to lose the day of settlement.

Plaintiff also requests that the McIntosh law firm, fix Plaintiff's records, and erase any and all traced of the judgement they acquired against Plaintiff illegally, to fix her credit and any other issues they caused with said judgement and pay restitution for said judgement against Plaintiff and relief for punitive damages caused by this judgement.

Plaintiff requests that all costs of the IVC through Mission My Care Plus be transferred into Sabrina Diz's name and for Your Honor to make her responsible for the costs of this forced hospitalization, as well as other relief the court feels just in this case.

Plaintiff respectfully requests that Your Honor Order Mission to release the names, and/or the license numbers of the nurses responsible for the violation of Plaintiff's rights and the malpractice perpetrated against Plaintiff by these nurses.

Plaintiff respectfully requests that an investigation be ordered into the activities by this DSS worker Kelly Marler, and all other consequences necessary for the protection of the public, to include but not limited to the loss of her position, a further investigation into other families whose children she had removed, and her connection to the members of the enterprise, as well as any and all other consequences and relief the court deems to be just and fair in this case.

Plaintiff respectfully requests that Your Honor find Adam Bull at least guilty of malpractice and order he pay relief for his actions against Plaintiff, and that Your Honor order FBI to do a deeper investigation into his ethical and legal violations against his own clients.

Plaintiff respectfully requests that Your Honor grant Plaintiff the relief available to her against Sergio De Sousa under Title 18 chapter 7 section 117 for willfully and maliciously violating the child support order for more than a year, for violating the court order and kidnapping his son and any other relief that the court finds to be appropriate and fair in this case.

Plaintiff respectfully requests that Your Honor order The Regeneration Station pay not only restitution for the stolen wood, but also restitution for all other costs Plaintiff had to pay due to their breach of contract and punitive damages for the hours of work Plaintiff had to put in due to their actions, the stress and physical labor involved in the repair of their damages and the material lost.

Any and all other relief the court's feel is fair and just in the eyes of the law.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/27/2017

Signature of Plaintiff



Printed Name of Plaintiff

PAMELA DIZ

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney



Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Street Address

\_\_\_\_\_

State and Zip Code

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address

\_\_\_\_\_